

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

JAMES GREENE, JENNIFER SHAAL, OFER  
SHAAL, JAKE STONE, GUY SHOSHAN, EINAT  
EZRA MICHAELI, and YIFAT SHMILOVICH, on  
behalf of themselves and all others similarly situated,

Plaintiffs,

v.

KABBALAH CENTRE INTERNATIONAL,  
INCORPORATED; KABBALAH CENTRES OF  
THE UNITED STATES, INCORPORATED;  
KABBALAH CENTRE OF NEW YORK,  
INCORPORATED; THE KABBALAH CENTRE OF  
FLORIDA, INC.; KABBALAH CHILDREN'S  
ACADEMY; KABBALAH ENTERPRISES,  
INCORPORATED; KAF INVESTMENTS, LLC; 501  
N. LA CIENEGA, LLC; SPIRITUALITY FOR KIDS  
INTERNATIONAL, INC.; and KAREN BERG,  
YEHUDA BERG, and MICHAEL BERG,

Defendants.

No. 19-cv-4304 (ILG)(SJB)

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
THE COMPLAINT**

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned attorneys for the parties, that:

1. The time within which Defendants Kabbalah Centre International, Incorporated; Kabbalah Centres of the United States, Incorporated; Kabbalah Centre of New York, Incorporated; The Kabbalah Centre of Florida, Inc.; Kabbalah Children's Academy; Kabbalah Enterprises, Incorporated; KAF Investments, LLC; 501 N. La Cienega, LLC; Spirituality For Kids International, Inc.; and Karen Berg, Yehuda Berg, and Michael Berg (collectively, "Defendants") may move, answer, or otherwise respond to the Complaint is hereby extended from August 19, 2019 through August 23, 2019, to and including September 23, 2019;

2. In the event that any of Defendants files a motion in lieu of an answer, Plaintiffs James Greene, Jennifer Shaal, Ofer Shaal, Jake Stone, Guy Shoshan, Einat Ezra Michaeli, and Yifat Shmilovich (collectively, "Plaintiffs") will have to and including November 4, 2019 to file their opposition or to amend the Complaint pursuant to Fed. R. Civ. P. 15(a)(2); and
3. Defendants will have to and including November 25, 2019 to file their reply to Plaintiffs' opposition or to respond to any amended complaint.

There has been no previous request for an extension of time in connection with this matter. Facsimile or electronic signatures on this Stipulation are hereby deemed originals. No provision of this Stipulation and Order shall be construed as a waiver of, and Defendants hereby expressly reserve, any and all defenses.

Dated: New York, New York  
August 15, 2019

PIERCE BAINBRIDGE BECK PRICE &  
HECHT LLP

/s/ Deborah H. Renner

Deborah H. Renner  
Shira Lauren Feldman  
Claiborne R. Hane  
Abbye R. Klamann Ognibene

277 Park Avenue, 45th Floor  
New York, NY 10172  
Phone: (212) 484-9866  
Fax: (646) 968-4125  
drenner@piercebainbridge.com  
sfeldman@piercebainbridge.com  
chane@piercebainbridge.com  
aognibene@piercebainbridge.com

*Attorneys for Plaintiffs James Greene,  
Jennifer Shaal, Ofer Shaal, Jake Stone, Guy  
Shoshan, Einat Ezra Michaeli, and Yifat  
Shmilovich*

PROSKAUER ROSE LLP

/s/ Elise M. Bloom

Elise M. Bloom  
Steven D. Hurd  
Pinchos N. Goldberg

Eleven Times Square  
New York, New York 10036  
Phone: (212) 969-3000  
Fax: (212) 969-2900  
ebloom@proskauer.com  
shurd@proskauer.com  
pgoldberg@proskauer.com

*Attorneys for Defendants Kabbalah  
Centre International, Incorporated;  
Kabbalah Centres of the United  
States, Incorporated; Kabbalah*

*Centre of New York, Incorporated;  
The Kabbalah Centre of Florida, Inc.;  
Kabbalah Children's Academy;  
Kabbalah Enterprises, Incorporated;  
KAF Investments, LLC; 501 N. La  
Cienega, LLC; and Spirituality For  
Kids International, Inc.*

SHAPIRO ARATO BACH LLP

LAW OFFICE OF JOHN D. CLINE

/s/ Jonathan P. Bach  
Jonathan P. Bach

/s/ John D. Cline  
John D. Cline

500 Fifth Avenue, 40th Floor  
New York, New York 10110  
Phone: (212) 257-4880  
Fax: (212) 202-6417  
jbach@shapiroarato.com

One Embarcadero Center, Suite 500  
San Francisco, California 94111  
Phone: (415) 662-2260  
Fax: (415) 662-2263  
cline@johndclinelaw.com

*Attorneys for Defendants Karen Berg  
and Michael Berg*

*Attorneys for Defendant Yehuda  
Berg*

Dated: Brooklyn, New York  
\_\_\_\_\_, 2019

**SO ORDERED:**

\_\_\_\_\_  
HON. I. LEO GLASSER  
UNITED STATES SENIOR DISTRICT JUDGE